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Regarding horizontal hydrofracking natural gas extraction:

Gas industry representatives and opponents of hydrofracking argue opposite sides of the safety concern. When deciding the merits of the arguments made by each side it is essential to keep in mind that the gas industry has been disingenuous. Either the gas industry was disingenuous when it successfully lobbied Congress that gas drilling needed to be exempted from Federal Clean Air/Clean Water laws, or the industry is disingenuous in its claims that hydrofracking gas extraction is safe.

NYS DEC will establish regulations and oversight with the intent of ensuring the safety of New Yorkers and the environment. It is also necessary to go beyond regulations and oversight. Risk and remediation of damages must be adequately accounted for, and remediation of harm must be ensured.

I believe society has near universal agreement that NYS tax payers, and US tax payers, should not indemnify any industry by taking over responsibility for any harm that industry may cause. I expect that, if asked, even hydrofracking industry spokespeople would agree to this principal. The best determiner of safety is the private sector, specifically, the insurance industry. The insurance industry is expert at determining risk and assessing an appropriate cost to insure against that risk. Before any hydrofracking gas extraction takes place in NYS, a requirement should be in place that any business wishing to engage in hydrofracking have insurance coverage for the duration of drilling operations to insure against environmental and other damage for at least 100 years into the future from the last date of coverage. The reason for requiring this is the fact that the coal gasification companies of the late 1800s and early 1900s created many of the Superfund Sites in NYS. My brother-in-law has been employed for twenty-five years quantifying, and monitoring the problems and clean-up efforts at some of these sites. The companies that created this very expensive mess are not around to pay the costs of containing and cleaning up the mess they left future generations. Tax payers are footing the bill. This is unacceptable. Hydrofracking has the potential to create a similar nightmare far into the future, and society must be insured against being left with the bill for dealing with future problems, as well as more immediate problems. Obviously, for society to be realistically insured 100 years into the future, the insurance company must be expected to be in business 100 years into the future. There must be requirements, such as assets and history of operation, along with requirements for a consortium of insurance companies to insure the risk so that if one insurance company goes out of business the others will still be viable to insure the risk. There may be other requirements necessary as well. If the hydrofracking industry cannot be insured by the private sector, then that is a definitive determination that hydrofracking is not yet safe enough to be done in NYS.

I have significant real estate investments in the Ithaca area, from which the majority of my income is derived. I am absolutely convinced that my real estate investments will be devalued if NYS so much as allows hydrofracking. If the kinds of problems that Pennsylvania, and other states, have experienced with hydrofracking happen in NYS, my property values will be further devalued. I am very concerned about this. The only possibility of mitigating the negative effects hydrofracking will have on real estate values in the Finger Lakes Region is if the industry is fully insured for at least 100 years coverage against any damage hydrofracking might cause. If the hydrofracking industry can secure this kind of insurance from the private sector for a cost which allows operation, then the industry is likely safe enough to be allowed to do its drilling, and the public will believe this to be true, thereby preserving real estate values. (Preserving, means preserving appreciation of value that would otherwise occur, not just a preserving a fixed dollar amount.)

As a property owner, I am concerned that my property taxes may have to be increased to deal with the

increased infrastructure costs of road improvement and repair, etc., etc. created by the hydrofracking industry. A boom industry with temporarily increased school and other infrastructure demands would be the worst. Again, it is unacceptable for private citizens to bear any part of the costs of a business doing its business (other than those which benefit society as a whole).

"Hundred year" floods have happened twice in the past twelve months in the Southern Tier, and several times in the past fifty years. The frequency and severity of flooding seems to be increasing. Recent flooding emptied hydrofracking chemical ponds in Pennsylvania. (Something that should have been covered by Federal Clean Air/Clean Water laws but is not.) If NYS allows hydrofracking, NYS must know exactly what chemicals are being used in the hydrofracking process, and NYS must have regulations sufficient to prevent loss of containment of hydrofracking chemicals during flooding.

Water is a plentiful resource in NYS. Water is becoming an ever more valuable resource in this country and around the world. Many states are mining ancient ground water reserves, a finite resource that is being rapidly depleted. The economies of these states are built on "a house of cards". Much of the South and South West are on borrowed time. NYS was an industrial might partly because of its abundant water resources which are so necessary for many industries. Many modern industrial processes require clean water. We must not sacrifice New York State's future for the allure of "fast money". NYS is well positioned for a resurgent 21 Century clean, industrial economy.

If hydrofracking is allowed in NYS, it should only be allowed to proceed slowly. This will diminish risks. It will also spread the value of the resource to the citizens of NYS over time. NYS must not make the mistake the British made exploiting their North Sea oil reserves. In just a few years the British have extracted the better half of those reserves. Boom and bust is a poor idea. There are other examples of boom and bust in the US and around the world. NYS should avoid making the same stupid mistakes that have already been made. Norway has set a much better example of how to proceed.

Given the long term value of gas and oil, the current value of these natural resources is unreasonably low. It makes little sense to plunge headlong into rapid exploitation of NYS's difficult to exploit, but none-the-less valuable natural resource at a time of ridiculously low prices. Agriculture, and our military require oil, as does so much of the rest of modern life. Cars, trucks, trains, lights, and heat can all be run on electricity generated by renewable sources of energy. Military equipment cannot run on electricity. Modern fertilizers and pesticides are made from oil. US long term strategic needs require the US to conserve its dwindling supplies of natural gas and oil. Though gas extracted from NYS is said to be for domestic needs, I understand that at least one of the companies that wishes to exploit NYS gas reserves intends to ship gas overseas. Make no mistake, US oil production peaked in the 1970's just as was predicted. The same accurate predictions of resource depletions that were used to accurately predicted US peak oil, predict that world oil production has peaked. Except for expected anomalies, there will be less and less oil to meet increasing world wide demand for oil. We are at the top of the bell curve, and have only a short while to make good decisions.

I am concerned that NYPIRG states, "New York's Department of Environmental Conservation (DEC) has once again failed to conduct an adequate environmental review for the controversial natural gas drilling method known as "fracking" and is rushing to allow this industrial practice to come to New York. DEC's latest review, the revised draft Supplemental Generic Environmental Impact Statement (rdSGEIS), is both woefully inadequate and fatally flawed and should go back to the drawing board. Specifically, DEC did not analyze public health impacts, they did not address the cumulative impacts of over 1,400 wells being drilled a year, they did not propose to ban the use of toxic chemicals, and they did not create a plan to dispose of the millions of gallons of toxic, and potentially radioactive, wastewater. New York's Department of Environmental Conservation (DEC) has once again failed to conduct an adequate environmental review for the controversial natural gas drilling method known as "fracking" and is rushing to allow this industrial practice to come to New York. DEC's latest review, the revised draft Supplemental Generic Environmental Impact Statement (rdSGEIS), is both woefully inadequate and

fatally flawed and should go back to the drawing board. Specifically, DEC did not analyze public health impacts, they did not address the cumulative impacts of over 1,400 wells being drilled a year, they did not propose to ban the use of toxic chemicals, and they did not create a plan to dispose of the millions of gallons of toxic, and potentially radioactive, wastewater." If NYPIRG is correctly stating the situation, it is an unacceptable state of affairs and **MUST BE CORRECTED**.

NYS DEC has one chance to get this right. Please get it right. Please proceed slowly (if at all) so that, if necessary, further adjustments can be made to ensure the safety of New Yorker's and the environment, long term as well as short term.